

RAE #10

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(17)

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

TONY ROBINSON,

Plaintiff,

Case No. 17-437 (DSD/KMM)

v.

ADVANCED MEDICAL IMAGING, INC.,
et al.,

Defendants.

**DEFENDANT DR. RANJIV SAINI'S RESPONSE TO PLAINTIFF'S SECOND SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Defendant Ranjiv Saini, M.D., by and through counsel, Leib Knott Gaynor LLC, responds to Plaintiff's Second Set of Interrogatories and Requests for Production of Documents as Follows:

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 13: Please state what your job as a Radiologist consist [sic] of?

- a. Are you to only look for fractures?
- b. Are you to also look for irregularities in bone structure.

RESPONSE: Objection. This interrogatory is vague and overly broad. Subject to these objections and without waiving the same, a radiologist is a medical doctor who specializes in the diagnosis and treatment of injuries. In responding to Subparts A-B, the diagnosis and treatment is case-specific. A radiologist's duty under the standard of care is defined by the specific circumstance of each case.

INTERROGATORY NO. 14: Please state whether it is a common practice to x-ray just the ankle and not the foot, or just the foot and not the ankle, or is common that they two different x-rays are usually combined?

RESPONSE: Objection, this request is vague and speculative. Subject to these objections and without waiving the same, Dr. Saini cannot state whether any of the suggested scenarios are a "common practice." Dr. Saini did not order the x-rays at issue and did not make a determination as to what part of the anatomy would be studied.

INTERROGATORY NO. 15: Please state approximately how many x-rays has Dr. Saini viewed of just an ankle?

- a. of just the foot
- b. of both foot and ankle combined.

RESPONSE: Objection, this request is overly broad, unduly burdensome, and seeks information disproportionate in the burden imposed on Dr. Saini to the probative value of the information. Subject to these objections and without waiving the same, Dr. Saini has no personal knowledge of the numbers of x-rays he has viewed in his professional career and no way to determine with any reasonable certainty the number of x-rays he has viewed of an ankle, a foot, or both.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 5: Please provide a copy of the policy and procedures Dr. Saini follows when interpreting any x-rays.

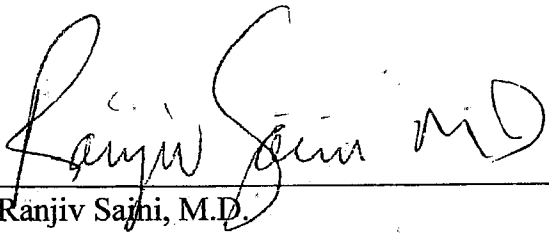
RESPONSE: No such responsive document exists.

REQUEST NO. 6: Please provide a copy of a detailed list of how many x-ray's [sic] of the ankle has Dr. Saini viewed in the past. From 1994 to present.

RESPONSE: Objection, this request is overly broad, vague, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and disproportionate in the burden imposed on Dr. Saini to the probative value of the information. Subject to these objections and without waiving the same, no such list exists nor, if it did, could it be provided based on regulations governing the confidentiality of patient information. See 45 C.F.R. § 160.

As to Answers:

Dated this 14 day of February, 2020.

By: 
Ranjiv Saini, M.D.

As to Objections:

Dated this 14th day of February, 2020.

LEIB KNOTT GAYNOR LLC

By: /s/ Douglas S. Knott
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